

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HERMÈS INTERNATIONAL, and
HERMÈS OF PARIS, INC.,

Plaintiffs,

v.

JOHN DOE 1 A/K/A LI HUA A/K/A
YAO DONG; JOHN DOE 2 A/K/A
HAO DA TOU A/K/A DA TOU LI
A/K/A HUWEISHENG
A/K/A GOU YI LU;
JOHN DOE 3 A/K/A LUOXIAOBO
A/K/A LIU MIAN A/K/A ZHEN
HONGXING A/K/A LIANGGUILIN
A/K/A LUO DA YOU A/K/A GAOHONG;
JOHN DOE 4 A/K/A JIU MA;
JOHN DOE 5 A/K/A CHEN YIBIN
A/K/A LEONA WANGQIANG;
JOHN DOE 6 A/K/A IAAI A/K/A
JKUOIU;
JOHN DOE 7 A/K/A XIN HONG;
JOHN DOE 8 A/K/A ZHENG RUISHAN;
JOHN DOES 9-100;
AND XYZ COMPANIES,

Defendants.

Civil Action

No.: 12 Civ. 1623

JUDGE COTE

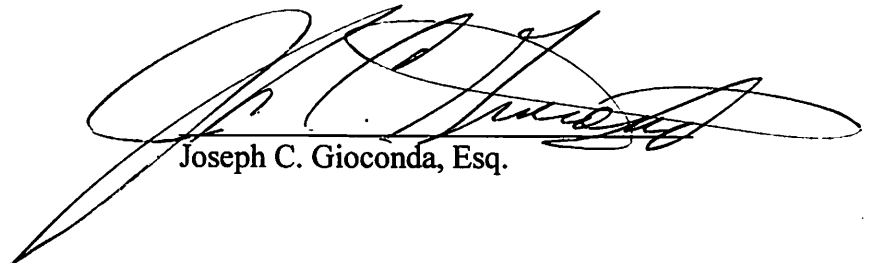
**DECLARATION OF JOSEPH C.
GIOCONDA, ESQ. IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN
ENTRY OF DEFAULT JUDGMENT
AGAINST ALL DEFENDANTS**

DECLARATION OF JOSEPH C. GIOCONDA, ESQ.

1. I am counsel for Hermès International and Hermès of Paris, Inc. (collectively, “Hermès” or “Plaintiffs”) in this matter.
2. I have reviewed the docket on this matter in the United States District Court for the Southern District of New York.
3. Pursuant to the terms of the Temporary Restraining Order, Seizure Order, Asset Restraining Order, Domain Name Transfer Order, Order for Expedited Discovery, Order Permitting Service By Electronic Mail, and Order to Show Cause for Preliminary Injunction, issued by the Court on March 6, 2012 (Docket No. 3) the Plaintiffs served each of the Defendants via electronic mail on March 8, 2012.
4. The Defendants’ answer to the Complaint was due on March 29, 2012.
5. As of today, the Plaintiffs have not been served with any valid response to the Complaint, no Defendant has answered, nor has any Defendant requested an extension of time in which to answer, nor has any counsel made an appearance on any of the Defendants’ behalf.
6. A copy of the Court docket is attached as Exhibit “A”.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 13, 2012



Joseph C. Gioconda, Esq.